

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
TERRANCE JAMES DELANEY, AKA :
TERRANCE DELANEY, AKA :
TERRANCE J. DELANEY, :
Debtor :
 :
JACK N. ZAHAROPOULOS, :
STANDING CHAPTER 13 TRUSTEE, :
Movant :
 :
vs. :
 :
TERRANCE JAMES DELANEY, AKA :
TERRANCE DELANEY, AKA :
TERRANCE J. DELANEY, :
Respondent : CASE NO. 5-25-bk-01829-MJC

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 12th day of August 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

1. Debtor's Plan violates 11 U.S.C. § 1325(a)(4) in that the value of property to be distributed under the Plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7. More specifically, Debtor has access to non-exempt equity in the following:

a. Injury or other claim.

2. Trustee avers that Debtor's Plan is not feasible based upon the following:

- a. The Plan is underfunded relative to claims to be paid. The Plan does not pay non-exempt equity plus payments on secured claims.
- b. Secured claim is not in the Plan. See Claim 1-1.

WHEREFORE, the Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 12th day of August 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Vincent Rubino, Esquire
Newman Williams, P.C.
712 Monroe Street
P.O. Box 511
Stroudsburg, PA 18360-0511

/s/ Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee